



**American Water Works
Association**

The Authoritative Resource on Safe WaterSM

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December 21, 2005

Secretary of Agriculture Mike Johanns
Farm Bill
1400 Independence Avenue, SW
Washington, DC 20250-3355

VIA EMAIL: FarmBill@usda.gov

**Re: Farm Bill Forum – Topic 4: The Achievement of Conservation and
Environmental Goals.**

Dear Mr. Secretary:

On June 17, 2005, the United States Department of Agriculture (USDA) requested public comments to be used in developing USDA recommendations for the 2007 Farm Bill (Federal Register, Vol. 70, No. 116, page 35221). Enclosed are the American Water Works Association's (AWWA) comments that address the question asked in Topic 4, "How can farm policy best achieve conservation and environmental goals?"

Protecting sources of drinking water is fundamental to providing safe drinking water to the American public. While the Safe Drinking Water Act and the Clean Water Act provide statutory requirements that protect public health and the environment, a stronger emphasis on conservation, pollution prevention, and the protection of our vital water resources in the Farm Bill is needed to meet these requirements. Specifically, we recommend a significant increase in funding for the Environmental Quality Incentives Program aimed at improving water quality in watersheds nationwide in cooperation with local water utilities.

AWWA appreciates your attention to these comments. If you have any questions regarding the above, please contact me or Al Warburton at AWWA's Washington D.C. office at (202) 628-8303.

Sincerely,

Thomas W. Curtis
Deputy Executive Director

**Comments by the American Water Works Association
For Developing USDA Recommendations
For the 2007 Farm bill
(70 FR 35221)**

I. INTRODUCTION

The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to the improvement of drinking water quality and supply. Founded in 1881, AWWA is the largest organization of water supply professionals in the world. Our 57,000-plus members represent the full spectrum of the drinking water community: treatment plant operators and managers, environmental advocates, scientists, academicians, and others who hold a genuine interest in water supply and public health. Our membership includes more than 4,700 utilities that supply roughly 80 percent of the nation's drinking water.

The comments provided herein reflect the consensus of the AWWA that, given the depth and breadth of its representation, also reflect the predominant view of the nation's drinking water professionals. It is therefore appropriate that these AWWA comments be heard on behalf of the drinking water community in general.

II. COMMENTS

AWWA appreciates the opportunity to comment on Farm Bill Forum Topic 4 – The Achievement of Conservation and Environmental Goals. AWWA also appreciates the United States Department of Agriculture (USDA) efforts to hold public forums to obtain stakeholder input on developing recommendations for the 2007 Farm bill.

Protecting sources of drinking water is fundamental to providing safe drinking water to the American public. While the Safe Drinking Water Act and the Clean Water Act provide statutory requirements that protect public health and the environment, a stronger emphasis on conservation, pollution prevention, and the protection of our vital water resources in the Farm Bill is needed to meet these requirements. We recommend a significant increase in funding for the Environmental Quality Incentives Program aimed at improving water quality in watersheds nationwide in cooperation with local water utilities. The following are AWWA's specific recommendations for the 2007 Farm Bill:

Environmental Quality Incentive Program (EQIP)

The protection of safe drinking water and public water supplies is an important aspect of the Environmental Quality Incentive Program (EQIP). The current Act does not place any emphasis on protecting drinking water supplies. EQIP should be amended to place greater emphasis on promoting eligible practices that protect drinking water source supplies on a watershed basis. Chapter 4 of subtitle D of title XII of the Food Security Act of 1985 (16U.S.C. 3839aa et seq.) should be amended to add a new Section 1240J that would establish a requirement for the Secretary to promote drinking water source protection by giving priority

to and providing cost-share payments, incentive payments, and loans to producers specifically to carry out eligible practices that implement a watershed plan that protects drinking water source supplies. Section 1240C of the Act should be amended to include protection of drinking water source supplies as a high priority for assistance. AWWA recommends specific reference to the protection of source water for human consumption as a high priority criteria for evaluating EQIP bids. These additions to the Act would elevate the protection of drinking water source supplies to the level of ground and surface water conservation in Section 1240I.

Additionally, AWWA believes that EQIP is under-funded and that greater benefits to the environment and to agricultural producers could be realized if a larger portion of the agriculture budget were devoted to EQIP. We believe that this will be more beneficial to the nation than other agricultural subsidies and is consistent with future World Trade Organization obligations on support to agriculture. Increased funding for EQIP is needed to address a number of important environmental problems, including agricultural runoff of pathogens, pesticides, fertilizers, and sediments, among other pollutants. Such runoff poses a significant challenge to many communities, especially to drinking water and wastewater utilities downstream. These communities must often spend large sums of money to correct or compensate for the agricultural runoff in their sources of drinking water and receiving streams. Increased EQIP funding can help achieve one of the purposes of the program by helping to avoid the need for increased local land use requirements and regulatory programs.

Partnerships and Cooperation

AWWA believes that local water utilities and other entities responsible for the protection and management of public water supplies can be important sources of technical assistance to producers and should be included among those from whom the Secretary requests services and with whom the Secretary seeks to develop cooperative agreements. Section 1243(f) of the Food Security Act of 1985 (16U.S.C. 3843) should be amended to place a high priority on establishing partnerships and cooperative agreements with water utilities to enhance the technical and financial assistance provided to producers to protect watersheds providing water for drinking water supplies. Local water utilities are an important source of technical advice and support for producers whose activities may affect water quality and drinking water supplies. The incentives provided by the Secretary in accordance with this subsection can play an important role in promoting a coordinated and collaborative approach to protect drinking water supplies, thus benefiting millions of Americans while improving the environmental performance of specific agricultural producers in designated project areas.

III. CONCLUSION

AWWA believes that these recommendations will help farm policy to best achieve conservation and environmental goals. A significant increase in funding for the Environmental Quality Incentives Program (EQIP) aimed at improving water quality in watersheds nationwide in cooperation with local water utilities will help achieve these goals.

AWWA looks forward to working with USDA and members of Congress to incorporate these recommendations into the 2007 Farm Bill.